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Electronic Filing May 17, 2023

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF NEVADA**

12 In re

13 CASH CLOUD, INC.,
14 dba COIN CLOUD,
15 Debtor.

Case No. BK-23-10423-mkn

Chapter 11

16 **SUPPLEMENTAL DECLARATION OF
17 TANNER JAMES IN SUPPORT OF
18 DEBTOR'S REPLY TO ENIGMA
19 SECURITIES LIMITED'S OMNIBUS
20 OBJECTION TO DEBTOR'S MOTIONS TO
21 APPROVE REJECTION OF EXECUTORY
22 CONTRACTS AND UNEXPIRED LEASES**

23 Hearing Date: May 18, 2023

24 Hearing Time: 10:30 a.m.

25 I, Tanner James, declare as follows:

26 1. I am a Senior Associate with Province, LLC ("Province").

27 2. Pursuant to a Final Order Authorizing Retention And Employment Of Province, LLC
28 As Financial Advisor, Effective As Of The Petition Date entered on March 9, 2023, Province was
employed as the financial advisor to Cash Cloud, Inc. dba Coin Cloud (the "Debtor" or "Cash
Cloud"), debtor and debtor in possession in the above captioned chapter 11 case (the "Chapter 11
Case").

29 3. In my capacity with Province and the employment of Province as the financial
30 advisor to the Debtor, I am familiar with the records of the Debtor and am familiar with the analysis

1 performed in connection with the Debtor's decisions to reject certain Contracts and Leases and
 2 abandon the Remaining Property. In addition, I am involved with the sale of the Debtor's assets.
 3 Except as otherwise indicated herein, this Declaration is based upon my personal knowledge. I am
 4 over the age of 18 and am mentally competent. If called upon to testify, I would testify competently
 5 to the facts set forth in this Declaration.

6 4. I make this Supplemental Declaration in support of the *Debtor's Reply To Enigma*
 7 *Securities Limited's Omnibus Objection To Debtor's Motions To Approve Rejection Of Executory*
 8 *Contracts And Unexpired Leases* ("Supplement").¹

9 5. This Supplement is being made to provide updated information that has been
 10 received since the filing of my Declaration in support of *Debtor's Reply To Enigma Securities*
 11 *Limited's Omnibus Objection To Debtor's Motions To Approve Rejection Of Executory Contracts*
 12 *And Unexpired Leases* on May 11, 2023 [ECF 550].

13 6. On May 15, 2023, I received a copy of an email sent to Debtor's counsel from
 14 counsel for RockItCoin requesting that RockItCoin be able to speak with contract parties who were
 15 listed in the Orders granting the *Debtor's First Omnibus Motion For Entry Of Order Approving*
 16 *Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(a) And*
 17 *Disposal Of Certain Personal Property Including Abandonment* and *Debtor's Second Omnibus*
 18 *Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases*
 19 *Pursuant To 11 U.S.C. § 365(a) And Disposal Of Certain Personal Property Including*
 20 *Abandonment*.

21 7. Thereafter, on May 15, 2023, I received an email from counsel for RockItCoin
 22 regarding its lease assumption list (the "List"). In this email, RockItCoin requested that it be
 23 permitted to contact some parties on the List before the Auction.

24 8. On May 16, 2023, counsel for the Debtor reviewed the List and determined that
 25 some contract parties, 73, are ones that are listed in the Debtor's motions to reject that are set for
 26
 27

28 1 Capitalized terms not defined herein shall have the meanings ascribed to them in the Motions.

1 hearing on May 18, 2023 (“Reject Motions”). Of those 73 locations, the majority pertain to one
2 master host agreement, BW Gas & Convenience Holdings, LLC.

3 9. RockItCoin has not requested that the Reject Motions be continued or withdrawn, or
4 that any Contract or Lease listed in the Reject Motions be removed.

5 I declare, under penalty of perjury of the laws of the United States of America, that the
6 foregoing statements are true and correct to the best of my knowledge, information and belief.

7 Executed this 17th day of May, 2023 in Las Vegas, Nevada.

8 */s/Tanner James*
9 Tanner James

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